

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION**

**JOHN M. PITMAN, III, et al.,** )  
   )  
   )  
**Plaintiffs,**                     )  
   )  
**vs.**                                 )   **Civil Action No.: 4:16-cv-00179**  
   )  
**XCENTRIC VENTURES, LLC, et al.,** )  
   )  
**Defendants.**                     )  
   )  
\_\_\_\_\_

**MOTION TO COMPEL**

Plaintiffs, John M. Pitman (“Pitman”) and Peninsula Plastic Surgery Center, LTD. (“PPS”) (collectively the “Plaintiffs”), by counsel, in accordance with Rule 37(a) of the Federal Rules of Civil Procedure, move for entry of an Order compelling Defendant Xcentric Ventures, LLC to answer Plaintiffs’ First Requests for Production of Documents. Without answers to these requests, Plaintiffs cannot adequately prepare for trial and is otherwise put to undue burden and expense. The reasons for Plaintiffs' motion are stated more fully in the accompanying memorandum in support.

WHEREFORE, Plaintiffs, John M. Pitman and Peninsula Plastic Surgery Center, LTD. respectfully request that the Court enter an order: (i) compelling Defendant Xcentric Ventures, LLC to provide a full and complete response to Plaintiffs’ First Set of Requests for Production of Documents; and (ii) for all other relief the Court deems necessary and proper.

Respectfully submitted,

JOHN M. PITMAN, III, and  
PENINSULA PLASTIC SURGERY  
CENTER, LTD

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## **CERTIFICATE OF SERVICE**

I hereby certify that on August 3, 2017, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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